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*Sylvia Lesse  
Of Counsel*

September 1, 2005

***Via electronic filing***

Marlene Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

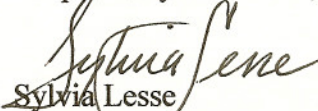
Re: South Canaan Cellular Communications Company, LP  
CC Docket No. 94-102  
E911 Phase II Interim Report

Dear Ms Dortch:

Pursuant to the Commission's *Order*,<sup>1</sup> South Canaan Cellular Communications Company, L.P. ("South Canaan") provides the attached information to assist the Commission in monitoring its E911 deployment progress.

Please contact the undersigned with any questions.

Respectfully submitted,



Sylvia Lesse  
Counsel for South Canaan  
Cellular Communications Company, LP

cc: Catherine W. Seidel, Acting chief, Wireless Telecommunications Bureau ("WTB")  
Kris Anne Monteith, Acting Chief, Enforcement Bureau  
Michael Wilhelm, Chief, Public Safety & Critical Infrastructure Division, WTB  
Bernie Swartwood, Pike County Communications  
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<sup>1</sup> *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, E911 Phase II Compliance deadlines for Tier III Carriers*, CC Docket No. 94-102, 20 FCC Rcd 7709 (2005) ("*Order*"),

**INTERIM REPORT  
OF SOUTH CANAAN CELLULAR COMMUNICATIONS COMPANY, L.P.**

September 1, 2005

Pursuant to the Commission's *Order*,<sup>1</sup> South Canaan Cellular Communications Company, L.P. ("South Canaan") provides the following information to assist the Commission in monitoring its E911 deployment progress.

- (1) Number of Phase I and Phase II requests received from PSAPs (including those the carrier may consider invalid) and the status of those requests, including whether the carrier and the PSAP have reached an alternative deployment date:**

South Canaan has received a valid Phase I request from Pike County and provides Phase I service to this county. South Canaan has also received a valid Phase II request from Pike County and provides Phase II service to this county. South Canaan initiated the provision of Phase II services to its Pike County service area on February 28, 2005. The Company has not received a Phase I or a Phase II request from the other county it serves, Wayne County.

- (2) Carrier's specific technology choice:**

South Canaan has successfully completed the conversion of its analog system to a digital CDMA technology.

- (3) Status on ordering and/or installing necessary network equipment:**

South Canaan has completed the installation of network equipment necessary to the provision of Phase II E911 services.

- (4) Date on which Phase II service was/will first be available in the carrier's network:**

Phase II service was first available on February 28, 2005.

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<sup>1</sup> *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, E911 Phase II Compliance deadlines for Tier III Carriers*, CC Docket No. 94-102, 20 FCC Rcd 7709 (2005) ("Order"),



**(5) Handset-based solution:**

- (a) Whether ALI-capable handsets are available, and whether carrier has obtained ALI-capable handsets or has agreements in place to obtain these handsets:**

ALI-capable handsets are available in the market, and South Canaan currently offers 11 ALI-capable models to its subscribers and has offered ALI-capable phones for 9 months, since November, 2004. Compliant phones constitute 100% of new phone sales.

- (b) Information on carrier's progress toward ensuring that 95% of subscriber base has location-capable handsets.**

Currently, approximately 61% of South Canaan direct customers utilize compliant phones,<sup>2</sup> a 78% increase in the penetration rate of 34% that existed at the first of this year. Despite this dramatic progress, South Canaan nonetheless reports its disappointment that its aggressive marketing campaign to promote digital service and ALI-capable handsets has not proven even more successful.

South Canaan targeted its analog phone customers with billing inserts and print advertising, emphasizing that location information will not be available to emergency service providers unless the customers transition to CDMA ALI-capable phones. The company also initiated an upgrade/trade-in program and direct mail campaign which included the offer of at least two models of completely subsidized compliant handsets (free to the subscriber) as well as other popular, heavily subsidized handsets (averaging a 35% subsidy for 1-year agreements and 74% subsidy for 2-year agreements) to entice customers to swap analog or TDMA handsets for the compliant CDMA phone. We believe that the lack of complete success in reaching the last 39% of our subscribers reflects either an unanticipated level of satisfaction with analog service or a simple reluctance to abandon satisfactory equipment. Accordingly, South Canaan will continue its program offering select free and other heavily subsidized handsets on all new and renewal contracts. While the Company is considering a program to mail free compliant handsets to all eligible subscribers, this approach may be financially infeasible. Moreover, such a program may not achieve the desired result, because, short of refusing to renew an agreement with an analog handset user, the handset upgrade process is not within the Company's control. Refusal to provide analog service is a drastic measure that could alienate loyal subscribers and result in business losses the Company cannot bear.

At this time, South Canaan plans to continue to offer analog service and, accordingly, it is possible that analog service will amply meet the mobile communications needs of more than five percent of its subscribers, rendering newer, compliant handsets unnecessary. Accordingly, South Canaan will monitor closely its penetration rates with an eye toward the January 31, 2006 extension expiration, and keep the Commission informed of its progress.

<sup>2</sup>

Approximately 50% of the system's users are TracFone resale customers.

## DECLARATION OF CAROLYN C. COPP

I, Carolyn C. Copp, President of South Canaan Cellular Communications Company, L.P., do hereby declare under penalty of perjury that I have read the foregoing "Interim Report" and that the facts stated therein are true and correct, to the best of my knowledge, information and belief.

Carolyn C. Copp  
Carolyn C. Copp

31 August 2005  
Date